

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

October 5, 1973

Colonel Thorwald R. Peterson
District Engineer
Corps of Engineers
St. Louis District
210 North 12th Street
St. Louis, Missouri 63101

40110907



Dear Colonel Peterson:

The need for reservoir storage for water quality control in the Union Lake project in the Meramec River Basin has been reviewed by this office in reference to Section 102(b) of the Federal Water Pollution Control Act Amendments of 1972, as requested by your letter of June 25, 1973, Attn: LMSD-BU.

As indicated previously in the Federal Water Pollution Control Administration October 21 and 29, 1970, letters, storage allocation in the Union Lake Project for flow augmentation for water quality control cannot be supported. Our policy stipulates stream flow shall not be used as a substitute for the provision of adequate waste treatment or other methods of controlling waste at the source. EPA defines "adequate waste treatment or other methods of controlling waste at the source" as the best available pollution control technology economically achievable including advanced waste treatment techniques, land disposal, land management practices, process and procedure innovations, changes in operating methods and other alternatives.

The Bourbeuse River, the stream in question, is in the effluent limitation class segment as designated by the Missouri Clean Water Commission. The effluent limitation class is defined as any segment where water quality is meeting and will continue to meet applicable water quality standards, or where there is adequate demonstration that water quality will meet applicable water quality standards after the application of the effluent limitations required by Sections 301(b)(1)(A) and 301(b)(1)(B) of the Federal Water Pollution Control Act Amendments of 1972. Therefore, waste discharges below the Union Lake project should be sufficiently treated at the source to maintain water quality as indicated in the "Water Quality Standards, Meramec River and Tributaries," Missouri Water Pollution Board, June 1968.

CONCURRENCES

SYMBOL	PPLA	PPLA	PPLA	MGMT	RGAD			
SURNAME	<i>Butler</i>	<i>WFR</i>	<i>WFR</i>					
DATE	<i>Oct 5, 1973</i>	<i>10/5/73</i>	<i>10/5/73</i>					

Water quality monetary benefits obtainable from streamflow regulations shall be credited only to reservoir storage specifically required for and allocated to water quality control. Any minimum flows required to protect the natural stream environment in the immediate vicinity of the proposed lakes should be considered as a benefit to the enhancement of fish and wildlife resources.

Thank you for the opportunity to review this project at this stage of your investigation.

Very truly yours,

Jerome H. Svora
Regional Administrator

cc: Missouri Clean Water Commission

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